

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

GARY WASHINGTON,

Plaintiff

v.

BALTIMORE POLICE DEPARTMENT,
THOMAS PELLEGRINI, OSCAR
REQUER, RICHARD FAHLTEICH,
JOHN TEWEY, FRED CERUTI, JOHN
MACGILLIVARY, UNKNOWN
EMPLOYEES OF THE BALTIMORE
POLICE DEPARTMENT, AND MAYOR
AND THE CITY COUNCIL OF
BALTIMORE,

Defendants

Case No. 1:19-cv-02473-GLR

Judge Stephanie Gallagher

JURY TRIAL DEMANDED

CONSENT MOTION FOR EXTENSION OF TIME

NOW COMES Plaintiff Gary Washington, by his undersigned counsel, Loevy & Loevy, and respectfully moves this Court for an order to extend the deadline for his response to Defendants Motion to Dismiss. In support of his motion, Plaintiff states as follows:

1. On December 2, 2019, Defendants Mayor and City Council of Baltimore (“City”) and the Baltimore Police Department (“BPD”) filed a Motion to Dismiss Plaintiff’s Amended Complaint. Dckt No. 29. The individual defendants who have appeared in this action answered Plaintiff’s Amended Complaint. Dckt No. 28.

2. Under Local Rule 105, Plaintiff's response to the City and BPD's motion to dismiss is due on December 16, 2019.

3. Due to other work commitments, including two federal appeals in the Fifth and Seventh Circuits, a prolonged *Daubert* hearing and out-of-town depositions, as well as the winter holidays, Plaintiff respectfully asks this Court for an extension up to and including January 7, 2020 to respond to Defendants' Motion to Dismiss.

4. Counsel for Plaintiff has spoken with counsel for the City and BPD, and Defendants do not oppose this request.

WHEREFORE, Plaintiff, Gary Washington, respectfully requests that this Court grant him up until and including January 7, 2020 in which to respond to Defendants' Motion to Dismiss.

Respectfully submitted,

GARY WASHINGTON

By: /s/ Gayle Horn
One of Plaintiff's Attorneys

Attorneys for Plaintiff

Jon Loevy
Gayle Horn
Roshna Bala Keen
Renee Spence
LOEVY & LOEVY
311 N. Aberdeen St.
Third Floor
Chicago, IL 60607
(312) 243-5900
(312) 243-5902 (fax)
gayle@loevy.com

CERTIFICATE OF SERVICE

I, Gayle Horn, an attorney, hereby certify that I filed the foregoing Motion via the Court's CM/ECF system on December 4, 2019, and thereby served a copy on all counsel of record.

/s/ Gayle Horn
One of Plaintiffs' Attorneys